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WESTERN DISTRICT OF LOUISIANA
SHREVEPORT, LOUISIANA
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

UNITED STATES OF AMERICA	*	5:22-cr-00086-01
	*	
VERSUS	*	Judge Foote
	*	Magistrate Judge Hornsby
CORTEZ L. BROWN	*	

INDICTMENT

THE GRAND JURY CHARGES:

COUNTS 1-4
Wire Fraud
[18 U.S.C. § 1343]

I. Introduction

1. The Social Security Act of 1935 created the unemployment insurance system. The United States Department of Labor (“DOL”) funds the system, but each state maintains its own agency to administer and distribute the funds on behalf of the federal government. The Louisiana Workforce Commission (“LWC”), a state agency located in Baton Rouge, distributes unemployment benefits in Louisiana.

2. On March 27, 2020, the President signed into law the Coronavirus Aid, Relief and Economic Security (“CARES”) Act. The CARES Act sought to mitigate the economic effects of the COVID-19 pandemic, and among other things, created the Federal Pandemic Unemployment Compensation (“FPUC”) program.

3. The FPUC program intended to increase unemployment benefits for millions of Americans affected by the COVID-19 pandemic. To that end, under the FPUC program, unemployment beneficiaries received an extra \$600 each week in addition to their regular

unemployment benefits. The LWC administered the FPUC program for the federal government.

4. To obtain benefits, Louisiana residents could apply through an online portal that the LWC maintained. The application included, among other things, the applicant's name, date of birth, social security number, mailing address, email address, and phone number. Applicants were required to disclose their current employment status.

5. Once an application was approved, the LWC paid unemployment benefits, including FPUC funds, through direct deposit or prepaid debit cards. If the beneficiary chose a prepaid debit card, the LWC would transfer funds onto a card issued by U.S. Bank, a financial institution in Minneapolis, Minnesota. The defendant, **Cortez L. Brown**, at all pertinent times resided in the Western District of Louisiana.

II. The Scheme to Defraud

Beginning on or about May 10, 2020, and continuing until August 20, 2020, in the Western District of Louisiana and elsewhere, the defendant, **Cortez L. Brown**, devised and intended to devise a scheme to defraud the United States, and furthermore, to obtain money and property from the United States, by means of materially false and fraudulent pretenses, representations, and promises.

III. Manner and Means

As part of the scheme to defraud, the defendant committed and caused to be committed various acts, including but not limited to, the following:

1. On or about May 10, 2020, **Cortez L. Brown** applied for unemployment benefits to the LWC through its online portal. In the application, **Cortez L. Brown** provided his name, date of birth, address, email address, and social security number. When asked about his employment status, **Cortez L. Brown** falsely stated that he was “not

working.” But in-fact, **Cortez L. Brown** did work for and receive wages from a factory in Sarepta, Louisiana and a restaurant in Springhill, Louisiana.

2. The LWC approved **Cortez L. Brown**’s application, and on or about May 11, 2020, U.S. Bank registered and issued a debit card to **Cortez L. Brown**.

3. Between June 7, 2020, and July 7, 2020, **Cortez L. Brown** changed the registered name, telephone, and address associated with his unemployment benefits, attempting to obscure and conceal his receipt of the unemployment benefits.

4. After approving **Cortez L. Brown**’s application, the LWC transferred funds to U.S. Bank for deposit onto **Cortez L. Brown**’s debit card. Among other things, the unemployment benefits were used to buy the cellular telephone that he used to send bomb threats to **Cortez L. Brown**’s employers, as alleged in Counts 7, 8, and 10.

5. On or about the dates referenced below, in the Western District of Louisiana, and elsewhere, the defendant, **Cortez L. Brown**, having devised the aforementioned scheme to defraud and to obtain money or property from the United States by means of materially false or fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme, knowingly caused the following interstate wire communications, to wit, ACH transfers of funds from the Louisiana Workforce Commission, located in Baton Rouge, Louisiana, to U.S. Bank, located in Minneapolis, Minnesota, for deposit onto a debit card ending in x4696:

Count	Date	Amount
1	05/19/2020	\$847.00
2	05/26/2020	\$790.00
3	08/10/2020	\$225.00
4	08/20/2020	\$247.00

All in violation of Title 18, United States Code, Section 1343.

COUNT 5

Theft of Government Money
[18 U.S.C. § 641]

1. The allegations of Count One are realleged and incorporated by reference as though as set forth in full herein.

2. On or about May 19, 2020, in the Western District of Louisiana, the defendant, **Cortez L. Brown**, willfully and knowingly did steal and purloin with the intent to convert to his own use money of the United States, that is, approximately \$847 in funds administered by the DOL, which funds defendant was not entitled to receive. All in violation of Title 18 United States Code, Section 641.

COUNT 6

Theft of Government Money
[18 U.S.C. § 641]

1. The allegations of Count Two are realleged and incorporated by reference as though as set forth in full herein.

2. On or about May 26, 2020, in the Western District of Louisiana, the defendant, **Cortez L. Brown**, willfully and knowingly did steal and purloin with the intent to convert to his own use money of the United States, that is, approximately \$790 in funds administered by the DOL, which funds defendant was not entitled to receive. All in violation of Title 18 United States Code, Section 641.

COUNT 7

Explosive Threat
[18 U.S.C. § 844(e)]

1. The allegations of Counts 1-4 are realleged and incorporated by reference as though as set forth in full herein.

2. On or about July 3, 2020, the Western District of Louisiana, and elsewhere, the defendant, **Cortez L. Brown**, by means and use of an instrument of commerce, to wit:

the internet, willfully threatened to unlawfully damage and destroy a building, to wit: a factory in Sarepta, Louisiana, by means of an explosive device. All in violation of Title 18, United States Code, Section 844(e).

COUNT 8
Explosive Threat
[18 U.S.C. § 844(e)]

1. The allegations of Counts 1-4 are realleged and incorporated by reference as though as set forth in full herein.

2. On or about July 6, 2020, the Western District of Louisiana, and elsewhere, the defendant, **Cortez L. Brown**, by means and use of an instrument of commerce, to wit: the internet, willfully threatened to unlawfully damage and destroy a building, to wit: a factory in Sarepta, Louisiana, by means of an explosive device. All in violation of Title 18, United States Code, Section 844(e).

COUNT 9
Explosive Threat
[18 U.S.C. § 844(e)]

On or about July 6, 2020, the Western District of Louisiana, and elsewhere, the defendant, **Cortez L. Brown**, by means and use of an instrument of commerce, to wit: the internet, willfully threatened to unlawfully damage and destroy a building, to wit: a restaurant in Springhill, Louisiana, by means of an explosive device. All in violation of Title 18, United States Code, Section 844(e).

COUNT 10
Explosive Threat
[18 U.S.C. § 844(e)]

1. The allegations of Counts 1-4 are realleged and incorporated by reference as though as set forth in full herein.

2. On or about July 7, 2020, in the Western District of Louisiana, and elsewhere, the defendant, **Cortez L. Brown**, by means and use of an instrument of commerce, to wit: the internet, willfully threatened to unlawfully damage and destroy a building, to wit: a factory in Sarepta, Louisiana, by means of an explosive device. All in violation of Title 18, United States Code, Section 844(e).

COUNT 11
Explosive Threat
[18 U.S.C. § 844(e)]

On or about September 8, 2020, in the Western District of Louisiana, and elsewhere, the defendant, **Cortez L. Brown**, by means and use of an instrument of commerce, to wit: the internet, willfully threatened to unlawfully damage and destroy a building, to wit: a factory in Sarepta, Louisiana, by means of an explosive device. All in violation of Title 18, United States Code, Section 844(e).

A TRUE BILL:

REDACTED

GRAND JURY FOREPERSON

BRANDON B. BROWN
United States Attorney

Leon H. Whitten (La. Bar No. 36724)
Assistant United States Attorneys
300 Fannin Street, Suite 3201
Shreveport, LA 71101
(318) 676-3600